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January 27, 2016

Hon. Vernon Broderick  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, N.Y. 10007  
BY ECF

Re: United States v. Shiwei Yan  
S2 15 Crim. 706 (VSB)

Dear Judge Broderick:

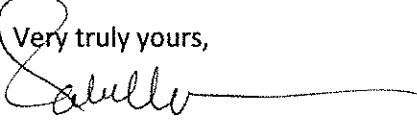
Christine Chung and I are counsel for Shiwei Yan, the above named defendant. On October 6, 2016, Ms. Yan was arrested in connection with the charges contained in the underlying indictment and remained in custody until November 5, 2015, when she released on a \$1,000,000.00 surety bond secured by property and four co-signers. The Court ordered home detention as a condition of release. She resides in a small apartment in Manhattan and other than meetings with counsel and Court appearances, she has spent very little time outdoors or even outside of her apartment since early November.

As you are aware, on January 20, 2016, Ms. Yan entered a guilty plea to a one count Information and is scheduled to be sentenced by your honor on April 29, 2016. As I'm sure you can appreciate, Ms. Yan has been under a great deal of emotional stress as a result of this case and has recently expressed great anxiety about her situation. It is our belief, and Ms. Yan agrees, that she would benefit from mental health counseling. We are, therefore, requesting that your Honor modify her current bail conditions to allow for mental health treatment under the direction of Pretrial Services. Additionally, we are requesting that the Court allow her to utilize the exercise room in her apartment building, as pre-approved by Pretrial Services.

Ms. Yan has recently applied for private health insurance, but has not yet begun to receive benefits under that policy. When she starts to receive those benefits, she may seek therapy from a private provider. Should she choose to do so, we will notify the Court and her pretrial officer.

The U.S. Attorney's Office and Pretrial Services have agreed to the above noted modifications.

Thank you for your attention to this matter.

Very truly yours,  
  
ISABELLE A. KIRSHNER

cc: Kenneth Rowan, Pretrial Services (By email)